

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

KIMBERLY COLLINS,)	C. A. NO: 2:15-CV-4465-PMD-BM
Plaintiff,)	
v.)	
CHARLESTON PLACE, LLC,)	
d/b/a BELMOND CHARLESTON PLACE,)	
Defendant.)	
_____)	

AFFIDAVIT OF EUGENE MATESI

1. My name is Eugene (“Geno”) Matesi, and I am a citizen of the United States and a resident of South Carolina. I am over the age of eighteen years, of sound mind, and capable of making this Affidavit. The statements contained herein are true and correct based upon my personal knowledge.

2. I am currently employed as the Director of Food and Beverage for Belmond Charleston Place. I was in this position at all times relevant to Kimberly Collins’s lawsuit. I am a Caucasian male.

3. In my position as Director of Food and Beverage, I was present for the “Black Lives Matter” protest in the Palmetto Café, a restaurant located inside the hotel, on April 13, 2015.

4. On that day, a group of demonstrators who were not guests or employees of the hotel staged a protest in the hotel lobby and the adjoining Palmetto Café. There were approximately 12-15 demonstrators. The demonstrators were loud but did not cause any physical damage to the hotel or its guests.

5. During the demonstration I called 911, the police arrived at the hotel, and the crowd disbursed and left the property. To my knowledge, there were no arrests made by the police.

6. Following the demonstration, I received an e-mail from Leon Scott regarding the demonstration. Ms. Collins asked that I forward the e-mail to her, and so I did.

7. After I forwarded the e-mail to Ms. Collins, I left my office to attend a meeting. When I returned from the meeting, Ms. Collins come into my office and said something to the effect of: "I think I'm going to get fired. I got into it in the employee cafeteria with Leon [Scott], Carol [Etheridge], and Shawn [Crawford]."

8. Ms. Collins was visibly nervous about what she had done with respect to her interactions with Mr. Scott, Ms. Etheridge, and Mr. Crawford and told me she thought she was going to be fired for her behavior.

9. Ms. Collins did not tell me during my April 13, 2015 conversation with her that Mr. Scott, Ms. Etheridge, or Mr. Crawford had raised their voices to her during their interaction in the employee cafeteria on that day.

10. General Manager Paul Stracey was out of the country during the events of April 13, 2015. Upon his return, I told him about my conversation with Ms. Collins.

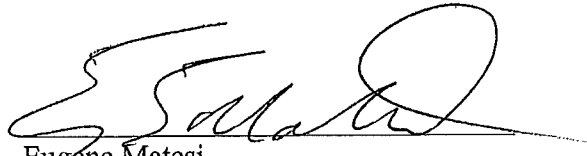
11. I specifically told Mr. Stracey that Ms. Collins was nervous about her behavior toward Mr. Scott, Ms. Etheridge, and Mr. Crawford and that Ms. Collins thought she was going to be fired for her conduct.

12. Mr. Stracey told me what Mr. Scott, Ms. Etheridge, and Mr. Crawford had reported to him about Ms. Collins's behavior in the employee cafeteria on April 13, 2015, and

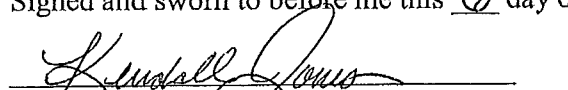
the version of events recounted to me by Ms. Collins supported what Mr. Scott, Ms. Etheridge, and Mr. Crawford had told Mr. Stracey.

13. I have read this statement consisting of three (3) pages, and it is true and correct based on my personal knowledge.

FURTHER AFFIANT SAYETH NOT.


Eugene Matesi

Signed and sworn to before me this 6 day of January, 2017.


Notary Public for the State of South Carolina

My Commission Expires: 07/28/2025

